From: <u>Tim Stroshane</u>

To: BDCPComments@icfi.com; Sally Jewell; Penny Pritzker; Mccarthy, Gina; John Laird; Mark W. Cowin; David

Murrillo

Cc: Conner Everts; Tom Howard; Diane Riddle; Maria Rea; Michael Tucker; Larry Rabin; Lori Rinek; Mary Lee Knecht;

Patty Idloff; Deanna Harwood; Kaylee Allen; Blumenfeld, Jared; Hagler, Tom; Vendlinski, Tim; Skophammer.

Stephanie; Foresman, Erin; Lisa Clay; Michael Nepstad; Zachary M. Simmons

Subject: Environmental Water Caucus Comments on "California WaterFix" Recirculated Draft EIR/ Supplemental Draft EIS

Date: Friday, October 30, 2015 12:21:44 PM
Attachments: EWC Comment Letter FINAL.pdf

ATT00001.txt

Dear Secretary Jewell, Secretary Pritzker, Administrator McCarthy, Secretary Laird, Director Cowin, Regional Director Murillo, and officers of various Federal and California agencies with responsibilities concerning the Bay Delta Conservation Plan/"California WaterFix":

Thank you for the opportunity to comment on these documents.

On behalf of Conner Everts, Facilitator of the Environmental Water Caucus and the signatories of the attached letter, Environmental Water Caucus member groups in California object to the adverse effects of the Bay Delta Conservation Plan/"California WaterFix" Tunnels Project. We find the Recirculated Draft EIR/Supplemental Draft EIS released this past July deficient. Its defects may only be repaired by recirculating another EIR/EIS that reflects needed corrections and revisions. Its defects are comprehensive: project objectives, purpose and need omit key details and rationales; essential baseline data and analyses are omitted; adverse impacts are numerous while others go unreported; mitigations are weak or nonexistent, and rely far too heavily on a too-optimistic assessment of state and federal water project operators' management of real-time operations and adaptive management research and monitoring agendas and outcomes; and the excessively narrow range of alternatives described in the RDEIR/SDEIS defeats CEQA and NEPA requirements that a reasonable range of alternatives be evaluated.

Should you have questions concerning this letter, please contact Tim Stroshane or Conner Everts with the Environmental Water Caucus, Our contact information is in the attached cover letter.